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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION

MDL No. 2843
Case No. 18-md-02843-VC

This document relates to:

ALL ACTIONS

**ADMINISTRATIVE MOTION TO FILE
UNDER SEAL**

Judge: Hon. Vince Chhabria
Courtroom 4, 17th Floor
Hearing Date: TBD
Hearing Time: TBD

Pursuant to Civil Local Rules 79-5 and 7-11, and the Stipulated Protective Order entered by the Court on August 17, 2018 (ECF No. 122), the Consolidated Plaintiffs (“Plaintiffs”) hereby submit this Administrative Motion to File Under Seal. Specifically, Plaintiffs move for leave to file under seal the following documents:

- Limited portions of paragraphs in Section II.C. in Plaintiffs’ Opposition to Defendant Facebook, Inc.’s Request to Enforce the Partial Stay of Discovery in Pretrial Order No. 20 and Cross-Motion to Compel Discovery Related to Requests for Production Nos. 9 through 13 (“Plaintiffs’ Opposition”).
- The 16 pages comprising Exhibit B, Bates Numbered FB-CA_MDL-00213424- FB-CA_MDL-00213439 to Plaintiffs’ Opposition designated as “Confidential” by Facebook, Inc. (“Facebook”).
- The 13 pages comprising Exhibit D, Bates Numbered FB-CA-MDL-01151469 to Plaintiffs’ Opposition designated as “Confidential” by Facebook.
- The two pages comprising Exhibit E, Bates Numbered PwC_CPUP_FB00030737 - PwC_CPUP_FB00030738 to Plaintiffs’ Opposition designated as “Highly Confidential – Attorneys’ Eyes Only” by PriceWaterhouseCoopers LLP (“PwC”).

Plaintiffs move for leave to file these portions of Plaintiffs’ Opposition under seal because Plaintiffs’ Opposition discusses and quotes portions of Exhibits B and D which Facebook. has designated “Confidential” pursuant to the Protective Order, as well as portions of Exhibit E which PwC has designated “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Protective Order. *See* accompanying Declaration of Derek W. Loeser (“Loeser Decl.”) ¶ 3.

Consistent with Rule 79-5(e), Plaintiffs, as the Designating Party, must file a declaration as required by subsection 79-5(d)(1)(A) establishing that all of the designated material is sealable, or the information at issue will be made part of the public record. Pursuant to this Court’s Standing Order, the document at issue has been provided to the Court by appropriately filing it electronically under seal in an unredacted form. Standing Order for Civil Cases Before Judge Vince Chhabria ¶ 32.

In light of the foregoing, Plaintiffs respectfully request that the Court grant their Administrative Motion to File Under Seal.

Dated: September 28, 2020

Respectfully submitted,

KELLER ROHRBACK L.L.P.

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